

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PENNSYLVANIA EMPLOYEE BENEFIT	:	
TRUST FUND, on behalf of itself and all	:	Civ. No. 1:05-cv-75 (ER)
others similarly situated, JOSEPH MACKEN,	:	(Lead Case)
and COMMISSIONER LINDA A.	:	
WATTERS,	:	
	Plaintiffs,	:
v.	:	
	:	
ZENECA, Inc. and ASTRAZENECA	:	
PHARMACEUTICALS, LP,	:	
	Defendants.	:

**NOTICE OF PLAINTIFFS' POSITION ON DEFENDANTS' MOTION TO SEAL**

1. This is Plaintiffs' response to Defendants' Motion to Seal Unredacted Amended Consolidated Class Action Complaint ("Motion") (D.I. #87). Plaintiffs take no position on the Motion. Plaintiffs' non-opposition to the Motion should not be construed as a concession that all of the material Defendants seek to redact from the Amended Consolidated Class Action Complaint is confidential or is protectable in some other context including, for example, in the context of a hearing or trial.

2. In the event the Court grants Defendants' Motion, Plaintiffs will promptly file the Amended Consolidated Class Action Complaint under seal with the Clerk of the Court pursuant to the District of Delaware's local rules and procedural guidelines.

Dated: August 31, 2009

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